

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**IN RE:**

**MARESA SHANNELL WASHINGTON**

**Debtor**

**CHAPTER 13**

**CASE NO. 25-60028**

**TRUSTEE'S OBJECTION TO CONFIRMATION, MOTION TO DISMISS,  
AND REQUEST FOR DOCUMENTS AND AMENDMENTS**

COMES NOW the Chapter 13 Trustee, and (i) submits this request for documents and amendments from the Debtor(s) following the meeting of creditors, and (ii) objects to confirmation of the Plan filed on 01/15/2025 and (iii) moves to dismiss this case unless all of the objections and requests for documents and amendments have been resolved prior to the hearing. The hearing on the Trustee's objection to confirmation and motion to dismiss or convert shall be held on:

**March 13, 2025 at 9:30 a.m.**

Parties should contact Judge Connelly's courtroom deputies at  
VAWBml\_Connelly\_Scheduling@vawb.uscourts.gov  
to obtain video access instructions and Zoom access information

1. The Trustee requests the Debtor to provide the following documents, or file with the Court the following amendments and pleadings, at least ten (10) days before the hearing noticed herein, to assist in resolving the Trustee's objections:

**Documents - Income**

- A copy of the Debtor's most recently filed federal and state income tax return or provide the Trustee with an affidavit for: 2024
- Bank and financial statements from all personal and business accounts for the period of: January 2025 (all accounts).
- Evidence that the Debtor(s) met with their employer's payroll office to determine if revising wage withholding and/or tax exemptions is necessary to ensure that sufficient taxes are being withheld.

**Documents - Other**

- File a pre-confirmation affidavit from Debtor(s), or other appropriate evidence to satisfy matters addressed in the affidavit.

**Pleadings**

- Submit a wage order or establish automatic and recurring TFS account for plan payments.

2. The Trustee objects to confirmation of the plan and requests that the Plan be amended to address the following issues:

**Amend Plan or Suggest Confirmation Order Language**

- Amend the plan to provide for the priority claim #4-1, or object to the claim, filed by Internal Revenue Service for \$6,788.87 (unfiled 2024 tax return).

**Objections**

- The Plan does not meet the Chapter 7 liquidation test pursuant to 11 U.S.C. Section 1325(a) (4). Trustee to review bank statements.
- The Debtor(s) are in default of plan payments in the amount of \$266.33 as of February 14, 2025.

3. The Trustee prays that any confirmation order entered in this case shall include the following other provisions:

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4. The Trustee shall ask for dismissal or conversion of the case if the Debtor does not timely commence making Plan payments at the rate and in the amounts stated in their Plan. If the Plan calls for payments through an automatic wage deduction from an employer, the Debtor must make payments directly to the Trustee until the wage deduction takes effect.

**WHEREFORE**, your Trustee requests that the Court dismiss or convert this case if the Debtor(s) fail to do any of the following: (i) resolve the objections noticed herein, (ii) provide the requested modifications, documents, amendments, and/or actions; (iii) appear at the original or adjourned Meeting of Creditors; (iv) remain current in Plan payments; or (v) file a confirmable Plan.

Dated: February 21, 2025

/s/ Shannon Morgan

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Shannon Morgan  
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### **CERTIFICATE OF SERVICE**

I certify that a true copy of this Trustee's Request for Documents and Amendments, Objection to Confirmation, and Motion to Dismiss or Convert was served by first class mail, postage paid, upon the Debtor and served electronically upon the Debtor's counsel on February 21, 2025.

/s/ Shannon Morgan

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